

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
UNITED STATES OF AMERICA

- v. -

TÜRKİYE HALK BANKASI, A.S.,
a/k/a "Halkbank,"

Defendant.
-----X

PROTECTIVE ORDER

S6 15 Cr. 867 (RMB)

Upon the application of the United States of America, with the consent of the undersigned counsel, and the defendant having requested and the Government having stated its intention to produce discovery material produced pursuant to the Jencks Act and *Giglio v. United States*, 450 U.S. 150 (1972) and its progeny ("3500 Material") in connection with the pretrial deposition of Husyein Korkmaz pursuant to Rule 15 of the Federal Rules of Criminal Procedure, the Court hereby orders as follows:

1. Defense counsel of record ("Defense Counsel") to whom 3500 Material is disclosed shall not show or disseminate any of the 3500 Material to anyone other than the defendant and U.S.-based paralegals, investigators, and interpreters working for Defense Counsel;

2. With respect to certain 3500 Material (the "Restricted Materials"), the defendant shall be granted access only to redacted versions of the Restricted Materials, and access to the Restricted Materials shall be further limited to Defense Counsel as well as U.S.-based investigators and interpreters working for Defense Counsel, each of whom shall acknowledge the provisions of this Stipulated Order in a signed writing;

3. Defense Counsel shall not transport or transmit or permit to be transported or transmitted any of the 3500 Material outside of the United States;

4. The defendant shall not possess any of the 3500 Material except when reviewing the 3500 Material in the presence of Defense Counsel or U.S.-based paralegals, investigators, or interpreters working for Defense Counsel, nor shall the defendant retain any copies, notes, extractions or reproductions based on or derived from the 3500 Material and all such copies, notes, extractions or reproductions shall be maintained by Defense Counsel;

5. Defense Counsel shall return to the Government, or destroy, all of the 3500 Material when any appeals have become final;


6. The entry of this Order does not prejudice any application by Defense Counsel to modify or supplement the terms of this Order; and

7. The provisions of this Order shall not terminate at the conclusion of this case and the Court shall retain jurisdiction to enforce this Order following termination of the case

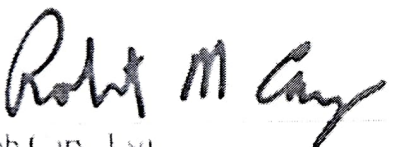
AGREED AND CONSENTED TO

DAMIAN WILLIAMS
United States Attorney

by


Michael D. Lockard
Jonathan Rebold,
Assistant United States Attorneys

Date: 12/12/2024


Rob Cary, Esq.
Williams & Connolly LLP
Counsel for Türkiye Halk Bankası A.Ş.

Date: December 11, 2024

SO ORDERED

Dated: New York, New York
December 11, 2024

SO ORDERED


HONORABLE RICHARD M. BERMAN
UNITED STATES DISTRICT JUDGE

December 16, 2024
Date